

Exhibit C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FORA FINANCIAL HOLDINGS, LLC	:
	:
Plaintiff,	: Case No. _____
vs.	:
	:
	:
NEW YORK TRIBECA GROUP, LLC and	:
JOHN DOES 1-10,	:
Defendants.	:
	:
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**NOTICE OF DEPOSITION TO NEW YORK TRIBECA GROUP, LLC
PURSUANT TO FED. R. CIV. P. 30(b)(6)**

PLEASE TAKE NOTICE that, pursuant to Rules 26, 30, and 45 of the Federal Rules of Civil Procedure, plaintiff Fora Financial Holdings, LLC will take the deposition of the officer(s), directors(s), managing agent(s), or other person(s) designated by New York Tribeca Group, LLC (“Tribeca”) concerning the topics set forth in the attached Schedule A. The deposition will commence at 10:00 a.m. on [a date to be inserted following Court order], at the offices of Locke Lord LLP, 200 Vesey Street, 20th Floor, New York, New York 10281, or at such other time and place as may be mutually agreed upon by the parties. The deposition will be videotaped and stenographically recorded by a person authorized by law to administer oaths, and will continue on consecutive days until completed.

Pursuant to Fed. R. Civ. P. 30(b)(6), Tribeca shall designate one or more officers, directors, managing agents or other persons who consent to testify on its behalf with respect to the topics set forth below in **Schedule A**, attached hereto. Tribeca is also requested to provide Fora Financial’s counsel with written notice at least five (5) business days prior to the date of the deposition of the name(s) and position(s) of the designee(s) who will testify on behalf of Tribeca and to identify the matters to which each designee will testify.

Dated: New York, New York
October 6, 2022

LOCKE LORD LLP

By: /s/ DRAFT
William D. Foley, Jr.
Jeffrey S. Kramer
200 Vesey Street, 20th Floor
New York, NY 10281
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Attorneys for Plaintiff

SCHEDULE A

DEFINITIONS AND INSTRUCTIONS

The following definitions and instructions shall apply to the terms used in the Schedule A accompanying the subpoena served pursuant to Federal Rules of Civil Procedure 26 and 45:

A. The terms “Tribeca,” “Defendant,” “You,” and “Your” refer to Defendant New York Tribeca Group, LLC, together with any present or former agents, employees, contractors, consultants, experts, representatives, persons acting or purporting to act on its behalf, and affiliated or related entities, including all such entities’ parents, affiliates, subsidiaries, divisions, predecessors- or successors-in-interest, past or present directors, officers, employees, consultants, experts, agents, representatives, or persons acting or purporting to act on its behalf.

B. The terms “Plaintiff” and “Fora Financial” shall refer to Fora Financial Holdings, LLC, the Plaintiff in the above-captioned action, and any of its parents, subsidiaries, affiliates, agents, employees, or any other persons acting or purporting to act on its behalf.

C. The term “Protected Information” means any information related to Fora Financial’s customers, including, but not limited to, customer contact information, government-issued identification numbers, proposed financing terms, and company financial information like revenue and bank statements. A non-exhaustive list of Fora Financial’s customers is set forth in paragraph 38 of Fora Financial’s Verified Complaint, served herewith.

D. The words “communication” or “communications” shall have the definition set forth in Local Rule 26.3(c)(1).

E. The words “document” and “documents” shall have the definition set forth in Local Rule 26.3(c)(2).

F. The terms “concerns,” “concerning,” “in relation to,” “relates to,” “relating to,” and “regarding” each should be broadly construed as meaning pertaining to, referring to, embodying, reflecting, mentioning, requesting, discussing, describing, analyzing, regarding, showing, identifying, evidencing, constituting, comprising, or connected with a stated subject matter.

G. The use of the name of a party or business organization shall specifically include all officers, directors, attorneys, agents, representatives, employees, parents, affiliates, subsidiaries, divisions, and predecessors- or successors-in-interest of the party or business organization.

H. Except as specifically provided herein, words that impart the singular shall include the plural and vice versa, and the terms “and” or “or” shall be interpreted as “and/or,” both conjunctively and disjunctively, to ensure the broadest disclosure of information. The past tense includes the present tense and vice versa where the clear meaning is not distorted by change of tense.

MATTERS FOR EXAMINATION

1. Tribeca’s relationships with third parties who provide leads, referrals, and other potential customer information to Tribeca.

2. Tribeca’s purchase, sale, and/or other acquisition of any and all leads, referrals, and other potential customer information.

3. Tribeca’s acquisition of Fora Financial’s Protected Information.

4. Tribeca’s use and/or disclosure of Fora Financial’s Protected Information.

5. Tribeca’s contacts with any merchants or customers, or potential customers, as a result of Tribeca’s acquisition of Fora Financial’s Protected Information.